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VIA ECF

The Honorable James R. Cho
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **Collazos v. Garda CL Atlantic, Inc., 21-cv-02095-PKC-JRC**

Dear Judge Cho:

Defendant, Garda CL Atlantic, Inc. (“Garda” or “Defendant”), by and through its undersigned counsel Holland & Knight LLP requests that the attached stipulation extending the time for Garda to answer Carlos Collazos’s, (“Plaintiff’s”) Complaint be so ordered and that Garda’s time to answer be extended until September 15, 2021. Currently, Defendant’s time to Answer Plaintiff’s Complaint is August 24, 2021.

With the consent of Plaintiff’s counsel, Defendant writes to the Court to request that the attached stipulation be so ordered, in order to allow the parties to continue their settlement negotiations. As noted previously, the parties have exchanged documents and are in the process of negotiating a potential settlement that could resolve the matter. Specifically, the parties have exchanged employment wage and hour records and collective bargaining agreements that cover issues raised in Plaintiff’s complaint. Lastly, Defendant’s collection and exchange of documents was slowed down by issues related to a lack employees in Defendant’s offices this summer.

Previously, this Court granted the Parties’ two (2) previous requests for an extension of time to answer the Plaintiff’s Complaint. Respectfully, Garda requests that the Court grants this request to extend its time to answer Plaintiff’s Complaint until September 15, 2021.

Respectfully submitted,

HOLLAND & KNIGHT LLP

/s/ Loren L. Forrest, Jr.
Loren L. Forrest Jr.